

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No.: 3:23CR-00054
	:	
Plaintiff,	:	JUDGE JAMES R. KNEPP, II
	:	
v.	:	<b><u>MOTION FOR LEAVE TO FILE</u></b>
	:	<b><u>SENTENCING MEMORANDUM</u></b>
BRYAN PERRY,	:	<b><u>UNDER SEAL</u></b>
	:	
Defendant.	:	

Now comes the Defendant, Bryan Perry, by and through counsel, and respectfully requests that this Court grant him leave to file his Sentencing Memorandum under seal.

The Defendant is requesting that the Sentencing Memorandum be filed under seal because there is sensitive information contained in the Memorandum. Further, Defendant would like the opportunity to freely communicate to the Court the necessary sensitive information without concern that it may be read by other parties.

WHEREFORE, Defendant requests leave of this Court to file his Sentencing Memorandum under seal.

Respectfully submitted,

Stephen Newman  
Federal Public Defender  
Ohio Bar: 0051928

s/ Donna M. Grill  
DONNA M. GRILL (#0062141)  
Office of the Federal Public Defender  
617 Adams Street, 2<sup>nd</sup> Floor  
Toledo, Ohio 43604  
(419) 259-7370 (O) 419-259-7375 (F)  
E-mail: donna\_grill@fd.org